

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDGE PATTERSON

UNITED STATES OF AMERICA

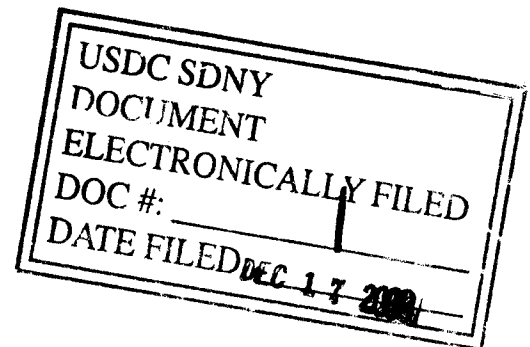
- v. -

INDICTMENT

MARK A. MADDEN,
a/k/a "Jason Brandon,"
a/k/a "Nasheen Stroud,"
a/k/a "Dwight Stevens,"
a/k/a "Curtis Covington,"
DAMIEN E. BANKS,
a/k/a "Hubert Blackman,"
a/k/a "Marife Woods,"
a/k/a "Sherman Anderson," and
GEORGE A. MORRISON, III,
a/k/a "Clifford Ampah,"
a/k/a "Joseph Gordon,"
a/k/a "Julian Cox,"

Defendants.

08 CRIM 1278



COUNT ONE

(Conspiracy to Commit Bank Fraud)

The Grand Jury charges:

1. From in or about February 2006, up to and including in or about October 2008, in the Southern District of New York and elsewhere, MARK A. MADDEN, a/k/a "Jason Brandon," a/k/a "Nasheen Stroud," a/k/a "Dwight Stevens," a/k/a "Curtis Covington," DAMIEN E. BANKS, a/k/a "Hubert Blackman," a/k/a "Marife Woods," a/k/a "Sherman Anderson," and GEORGE A. MORRISON, III, a/k/a "Clifford Ampah," a/k/a "Joseph Gordon," a/k/a "Julian Cox," the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other, to commit offenses against

MICROFILMED

DEC 19 2008 12:00 PM

the United States, to wit, to violate Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that MARK A. MADDEN, a/k/a "Jason Brandon," a/k/a "Nasheen Stroud," a/k/a "Dwight Stevens," a/k/a "Curtis Covington," DAMIEN E. BANKS, a/k/a "Marife Woods," a/k/a "Sherman Anderson," and GEORGE A. MORRISON, III, a/k/a "Clifford Ampah," a/k/a "Joseph Gordon," a/k/a "Julian Cox," the defendants, and their co-conspirators, unlawfully, willfully, and knowingly, would and did execute and attempt to execute a scheme or artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations and promises, in violation of Title 18, United States Code, Section 1344.

Means and Methods of the Conspiracy

3. Among the means and methods by which MARK A. MADDEN, a/k/a "Jason Brandon," a/k/a "Nasheen Stroud," a/k/a "Dwight Stevens," a/k/a "Curtis Covington," DAMIEN E. BANKS, a/k/a "Marife Woods," a/k/a "Sherman Anderson," and GEORGE A. MORRISON, III, a/k/a "Clifford Ampah," a/k/a "Joseph Gordon," a/k/a "Julian Cox," the defendants, and their co-conspirators,

would and did carry out the conspiracy were the following:

a. The defendants and their co-conspirators obtained counterfeit checks, drawn against customer accounts at Bank of America, Commerce Bank, Sovereign Bank, and Washington Mutual (the "Victim Accounts").

b. The defendants and their co-conspirators obtained false identification documents in the form of, for example, false drivers' licenses and false or fraudulently obtained credit cards and debit cards in the names of the persons to whom the Victim Account checks were made payable.

c. The defendants and their co-conspirators then cashed counterfeit checks against the Victim Accounts by presenting these false identification documents at various bank branches in New York, New York, and elsewhere.

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about December 14, 2007, MARK A. MADDEN, a/k/a "Jason Brandon," a/k/a "Nasheen Stroud," a/k/a "Dwight Stevens," a/k/a "Curtis Covington," cashed a counterfeit check in the amount of \$970.20, payable to "Dwight Stevens," at a Commerce Bank branch in Roselle, New Jersey. The counterfeit

check was from a Commerce Bank victim account ("Victim Account-1") located in New York, New York.

b. On or about December 14, 2007, DAMIEN E. BANKS, a/k/a "Hubert Blackman," a/k/a "Marife Woods," a/k/a "Sherman Anderson," the defendant, cashed a counterfeit check in the amount of \$991.17, payable to "Hubert Blackman," at a Commerce Bank branch in Roselle, New Jersey. The counterfeit check was from Victim Account-1.

c. On or about July 10, 2006, GEORGE A. MORRISON, III, a/k/a "Clifford Ampah," a/k/a "Joseph Gordon," a/k/a "Julian Cox," the defendant, cashed a counterfeit check in the amount of \$1,490.25, payable to "Joseph Gordon," at a Commerce Bank branch in New York, New York. The counterfeit check was from a Commerce Bank victim account ("Victim Account-2") located in New York, New York.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Bank Fraud)

The Grand Jury further charges:

5. From in or about December 2006, up to and including in or about December 2007, in the Southern District of New York and elsewhere, MARK A. MADDEN, a/k/a "Jason Brandon," a/k/a "Nasheen Stroud," a/k/a "Dwight Stevens," a/k/a "Curtis Covington," the defendant, and others known and unknown,

unlawfully, willfully, and knowingly did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, MADDEN knowingly cashed and attempted to cash counterfeit checks at Bank of America.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT THREE

(Bank Fraud)

The Grand Jury further charges:

6. From in or about November 2007, up to and including in or about July 2008, in the Southern District of New York and elsewhere, DAMIEN E. BANKS, a/k/a "Hubert Blackman," a/k/a "Marife Woods," a/k/a "Sherman Anderson," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and

fraudulent pretenses, representations, and promises, to wit, BANKS knowingly cashed and attempted to cash counterfeit checks at Bank of America.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT FOUR

(Bank Fraud)

The Grand Jury further charges:

7. From in or about November 2007, up to and including in or about March 2008, in the Southern District of New York and elsewhere, MARK A. MADDEN, a/k/a "Jason Brandon," a/k/a "Nasheen Stroud," a/k/a "Dwight Stevens," a/k/a "Curtis Covington," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, MADDEN knowingly cashed and attempted to cash counterfeit checks at Commerce Bank.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT FIVE

(Bank Fraud)

8. From in or about July 2006, up to and including in or about March 2008, in the Southern District of New York and elsewhere, DAMIEN E. BANKS, a/k/a "Hubert Blackman," a/k/a "Marife Woods," a/k/a "Sherman Anderson," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, BANKS knowingly cashed and attempted to cash counterfeit checks at Commerce Bank.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT SIX

(Bank Fraud)

The Grand Jury further charges:

9. From in or about February 2006, up to and including in or about September 2007, in the Southern District of New York and elsewhere, GEORGE A. MORRISON, III, a/k/a "Clifford Ampah," a/k/a "Joseph Gordon," a/k/a "Julian Cox," the defendant, and others known and unknown, unlawfully, willfully, and

knowingly did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, MORRISON knowingly cashed and attempted to cash counterfeit checks at Commerce Bank.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT SEVEN

(Bank Fraud)

The Grand Jury further charges:

10. From in or about November 2007, up to and including in or about December 2007, in the Southern District of New York and elsewhere, MARK A. MADDEN, a/k/a "Jason Brandon," a/k/a "Nasheen Stroud," a/k/a "Dwight Stevens," a/k/a "Curtis Covington," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of

false and fraudulent pretenses, representations, and promises, to wit, MADDEN knowingly cashed and attempted to cash counterfeit checks at Sovereign Bank.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT EIGHT

(Bank Fraud)

The Grand Jury further charges:

11. From in or about November 2007, up to and including in or about December 2007, in the Southern District of New York and elsewhere, DAMIEN E. BANKS, a/k/a "Hubert Blackman," a/k/a "Marife Woods," a/k/a "Sherman Anderson," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, BANKS knowingly cashed and attempted to cash counterfeit checks at Sovereign Bank.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT NINE

(Bank Fraud)

The Grand Jury further charges:

12. From in or about March 2006, up to and including in or about April 2006, in the Southern District of New York and elsewhere, GEORGE A. MORRISON, III, a/k/a "Clifford Ampah," a/k/a "Joseph Gordon," a/k/a "Julian Cox," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, MORRISON knowingly cashed and attempted to cash counterfeit checks at Washington Mutual Bank.

(Title 18, United States Code, Sections 1344 and 2.)

FORFEITURE ALLEGATION

13. As a result of committing the offenses alleged in Counts One through Nine of this Indictment, MARK A. MADDEN, a/k/a "Jason Brandon," a/k/a "Nasheen Stroud," a/k/a "Dwight Stevens," a/k/a "Curtis Covington," DAMIEN E. BANKS, a/k/a "Hubert Blackman," a/k/a "Marife Woods," a/k/a "Sherman Anderson," and GEORGE A. MORRISON, III, a/k/a "Clifford Ampah," a/k/a "Joseph

Gordon," a/k/a "Julian Cox," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 982, any property constituting or derived from proceeds obtained directly or indirectly as a result of the conspiracy to commit the bank fraud offenses alleged in Counts One through Nine of this Indictment.

Substitute Asset Provision

14. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant(s) up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982, 1344 and 1349.)


FOREPERSON


LEV L. DASSIN
Acting United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MARK A. MADDEN,
a/k/a "Jason Brandon," a/k/a "Nasheen
Stroud," a/k/a "Dwight Stevens," a/k/a
"Curtis Covington,"

DAMIEN E. BANKS,
a/k/a "Hubert Blackman," a/k/a "Marife
Woods," a/k/a "Sherman Anderson," and

GEORGE A. MORRISON, III,
a/k/a "Clifford Ampah," a/k/a "Joseph
Gordon," a/k/a "Julian Cox,"

Defendants

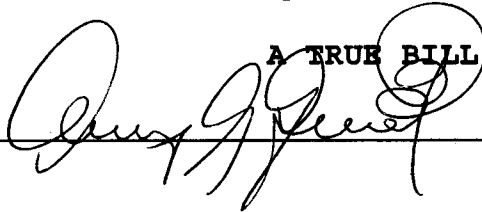
INDICTMENT

08 Cr.

(18 U.S.C. §§ 1344, 1349, and 2)

LEV L. DASSIN
Acting United States Attorney.

A TRUE BILL



Foreperson.
